

REPORT TO WASHINGTON STATE BOARD OF HEALTH

**IMPLEMENTATION SURVEY REPORT
WAC 246-366
PRIMARY AND SECONDARY SCHOOLS**

February 12, 1997

***Washington State Department of Health
Division of Environmental Health Programs
Office of Community Environmental Health***

Contacts:

***Eric Slagle, Assistant Secretary, Div. of Env. Health Programs (360) 586-5212
Bill White, Director, Office of Community Env. Health (360) 586-5797
Gary Plews, Section Manager, Consolidated Programs (360) 753-1945***



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Judith Maire, Ed Strozyx and Terry Michalson, Office of the Superintendent of Public Instruction

Chuck Treser and Deborah Dickstein, University of Washington Directors of Environmental Health and the Living Environment Committee, David Swink, Chairman



Introduction:

On June 8, 1994 the Washington State Board of Health adopted several resolutions involving WAC 246-366, Primary and Secondary Schools. The resolutions assigned several tasks to the Office of Community Environmental Health Programs, Department of Health including "Resolution A." which states the following:

"Request DOH, OSPI, local health departments/districts, and the University of Washington School of Public Health and Community Medicine jointly undertake a survey of implementation of Board rules related to public and private schools and school environments, and report to the Board no later than May 1996."

Due to staffing limitations, a request was made to extend the deadline for preparation and presentation of the report to the Board. The following report summarizes our findings and provides specific recommendations based on those findings and other pertinent factors.

Methodology:

In response to "Resolution A", the various entities mentioned in the resolution were contacted for ideas on how to best capture the level of implementation of the Board of Health rules governing public and private schools. As a result, it was decided that the basis for determining statewide implementation would be to send a survey questionnaire to all local health jurisdictions. The focus for the questionnaire was to identify a variety of indicators of level of implementation of WAC 246-366 including the following categories:

- Frequency and extent of comprehensive school health inspections**
- Importance of activities relative to all environmental health functions**
- Level of staffing for environmental health activities in schools**
- Fee schedules for various activities**
- Limitations to implementation of a school inspection program**
- Additional environmental health activities beyond regulatory actions**
- Collection and analysis of school inspection information**

Assistance in designing a questionnaire to capture the information from the various categories was obtained from the University of Washington. The focus of the questionnaire was to take no more than 20 minutes to complete and be constructed in a manner that review of records or files would not be necessary.

Once a draft questionnaire was developed, review of the questionnaire by local health department staff on the Environmental Health Director's living environment committee was solicited. After receiving comments and making several modifications, the questionnaire was pretested in selected local health departments. The final questionnaire was developed after obtaining the results and comments from the pretest process. On May 20, 1996, the questionnaire was mailed or faxed to all 32 local health jurisdictions.

The response by local health departments was both timely and thorough with 28 of 32 of the questionnaires completed for a return rate of 86.5%. Additionally, the jurisdictions responding are responsible for 98.4% of the schools statewide that are covered by WAC 246-366. Therefore, the participation level provides a higher degree of confidence in the validity of the results of the survey.

Executive Summary:

Overall, the most obvious finding from reviewing the survey results is that there is a wide variation throughout the state in the level of implementation of WAC 246-366 and the types of other regulatory and non-regulatory activities. Nevertheless, some basic conclusions can be derived from the survey questionnaire. Some of the key observations are as follows:

Relative importance of school inspection activity

The importance of the school inspection activity in primary and secondary schools in relation to other environmental health functions varies considerably throughout the local health jurisdictions. Those jurisdictions responsible for over 70% of the public and private schools have indicated that the level of importance is "moderate" to "moderately high".

Frequency of routine comprehensive school inspections

Approximately 25% of the schools in the state are never given a comprehensive inspection per WAC 246-366. No health jurisdictions conducts such inspections more frequently than once a year.

Frequency of issue specific inspections

A significant number of issue specific inspections occur in schools associated with WAC 246-366 and other environmental health regulations for specific issues. Approximately 90% of the local health jurisdictions indicated they had conducted such inspections. Food service inspections, and responses to a variety of complaints were most frequently mentioned.

Statewide staffing for implementation of WAC 246-366

The total number of FTE's committed statewide to the school program for comprehensive inspections is very limited. Of the approximately 450 environmental health staff within local health jurisdictions, a combined total of 7 FTE's is designated for the school program per WAC 246-366. This represents less than 2% of their total staffing commitment.

Variations in type and use of fees

Fees charged by local health jurisdictions to public and private schools varies considerably in the amount of fees and whether or not they are applied for inspection services. There is an even split between those agencies with fees and those without fees statewide.

Barriers and limitations to a comprehensive school inspection program

Several barriers and limitations to conducting a comprehensive school inspection program were identified with the level of importance ranging from "moderate" to "critical importance". Those barriers and limitations ranked in order of greatest importance includes the following:

- Lack of staff resources.
- Lack of revenue base.
- Lack of cooperation from school districts.
- Lack of political support from local boards of health.

Successful efforts beyond traditional inspections

Over 50% of the local health jurisdictions indicated they have conducted successful environmental health programs on a large variety of topics outside of the traditional school regulations requirements. Examples include school playground projects, various education and training activities, consultation with parent/teacher organizations and advisory boards, and special investigation and assessment of environmental health hazards.

Collection and compilation of school inspection data

Very little data from school inspection activities is being collected and placed into a computerized data assessment program with less than 15% of the local health jurisdictions indicating such activity. The data that is collected is specialized (i.e. playground safety statistics, food inspection findings) rather than a comprehensive tabulation for all categories under WAC 246-366.

Survey Results

10/31/96

Local Health Department Questionnaire Chapter 246-366 WAC - Primary and Secondary Schools Implementation Survey for State Board of Health

Note: The following information is compiled from the questionnaires returned from 28 of 33 Local Health Jurisdictions responsible for 2365 of the total of 2402 Public & Private Schools, K-12 in Washington State.

PREVENTION: Health Protection

1. Relative to all environmental health functions that are conducted by your office, what is the importance of conducting comprehensive inspections of primary and secondary schools under Chapter 246-366 WAC? The 28 local health jurisdictions responded as follows:

Response	Local Health Jurisdictions		Public & Private Schools Covered	
	No.	Percent	No.	Percent
Low	6	21.4	236	10.0
Moderately Low	7	25.0	254	10.7
Moderate	6	21.4	1080	45.7
Moderately High	8	28.6	616	26.0
High	1	3.6	179	7.6

2. When schools are built (e.g., new schools) or altered (e.g., new additions) in your jurisdiction, how often does your office conduct plan reviews and pre-occupancy inspections as described by WAC 246-366-040?

Always
76.8%

Sometimes
23.2%

Never
0.0%

3. On the average, how often does your office conduct **comprehensive inspections** of K-12 public and private schools to assure compliance with Chapter 246-366 WAC, Primary and Secondary Schools?

Response	Public Schools				Private Schools			
	Local Health Jurisdictions		Schools		Local Health Jurisdictions		Schools	
	No.	Percent	No.	Percent	No.	Percent	No.	Percent
More than once/year	0	0.0	0	0.0	0	0.0	0	0.0
Once/year	6	21.4	277	14.5	5	17.8	58	12.8
Less than once/year	5	17.8	320	16.7	4	14.3	59	13.1
Less than once/3 years	5	17.8	578	30.2	6	21.4	208	46.0
Less than once/5 years	4	14.3	138	7.2	4	14.3	20	4.4
Never	6	21.4	497	26.0	7	25.0	86	19.0
Only upon request	1	3.6	38	2.0	1	3.6	4	0.9
Pre-operation only	1	3.6	65	3.4	1	3.6	17	3.8
Totals	28	99.9%	1913	100.0%	28	100.0%	452	100.0%

4. Does your office ever conduct **issue specific inspections** (e.g., just food handling inspections) of K-12 public and private schools within your jurisdiction to assure compliance with Chapter 246-366 WAC, Primary and Secondary Schools?

Yes No
89.3% 10.7%

If yes, would you please describe why and provide some examples (e.g., *responding to a complaint*)?

Several examples were provided on issue specific inspections including the following:

- Food service inspections either routinely or upon request.
- Response to complaints on a variety of topics such as indoor air, waste water, drinking water supply, building structure, toxic chemicals, and injuries.
- Playground safety inspections to assure compliance with accepted minimum guidelines for safety.
- Disease investigations due to high absentee rate or other information prompting a special investigation.
- Swimming pool and spa inspections to assure compliance with water recreation criteria.
- Special event inspections
- Small animal in classroom situations prompting inspection need.
- Private school request for inspection to maintain funding.

5. Does your office ever conduct **issue specific inspections** (e.g., just food handling inspections) of K-12 public and private schools within your jurisdiction to assure compliance with other regulations such as the food code?

Yes	No
92.3%	7.7%

If yes, would you please describe why and provide some examples (e.g., *conducting a routine food inspection, etc.*)?

Specific examples including the regulation providing authority for inspections included the following:

-Food service inspections to assure compliance with WAC 246-215, Food Service, was the most frequently mentioned example.

-Pool inspections to assure compliance with WAC 246-260, Water Recreation Facilities, was cited.

-Sewage inspections including complaint response, maintenance and operation issues, and other miscellaneous on-site sewage issues to assure compliance with WAC 246-....., On-site Sewage Systems.

-Water supply inspections primarily associated with individual well serving rural schools to assure compliance with WAC 246-291, Public Water Supplies.

-Illness investigation inspections to assure compliance with WAC 246-100, Communicable Diseases.

PREVENTION: Health Protection (Capacity)

6. Approximately how much **staff time** (total FTE's) is allocated for school inspections?

Total for all health departments/districts: 7.0 FTE(s)*

<u>Level of Staffing</u>	<u>% of Local Health Jurisdictions</u>
No FTE's	10.7%
0.01 - .10 FTE's	35.7%
.11 - .60 FTE's	46.5%
.61 - 1.0 FTE's	7.1%
Greater than 1.0 FTE's	<u>0.0%</u>

100.0% Total

*Note: The 7.0 FTE's allocated for school inspections represents 1.5% of the total environmental health staffing for all local health jurisdictions statewide.

7. Do you have a fee schedule for comprehensive inspections of schools?

Yes	No
48.2%	51.8%

If yes, would you please itemize the fees or attach a fee schedule.

Information was provided through detailed fee schedules showing a wide range of fee categories as follows:

- Fees based on a flat hourly basis for inspection services
- Fees based on a per inspection basis
- Fees for special temporary events
- Fees for plan review only
- Fees for playground services
- Fees for private school certification

** Additional information on fees is available but is not included since many of the schedules are quite lengthy and difficult to summarize.*

8. How important is each of the following barriers and limitations to implementing an inspection program under Chapter 246-366 WAC?

Category

Ranking (Average value shown)

	No Importance	Moderate Importance	Critical Importance
Lack of staff resources	1	■ 3.9	5
Lack of revenue base (fees)	1	■ 3.7	5
Lack of staff training	1	■ 2.7	5
Lack of cooperation from school districts	1	■ 3.6	5
Lack of public health priority for community	1	■ 3.0	5
Lack of political support (local health board)	1	■ 3.2	5
Other: _____			

If "Other" please explain:

Additional barriers were identified by several local health jurisdictions including the following:

-Lack of adequate regulations and guidelines needed to conduct an environmental health school program was identified as a barrier of critical importance by four health jurisdictions. The current regulations were described as "cumbersome, overlapping, conflicting, intrusive, vague, outdated and inadequate".

-Lack of direction and standardization from State Department of Health for inspections and interpretation of WAC 246-366 was identified by one department.

-Local Education School District risk manager interference was identified as a barrier of critical importance by one department.

-School superintendents have convinced key local Board of Health members that local health services are not important in one health department because:

- 1. Schools take care of kids safety.**
- 2. Risk pool takes care of kids.**
- 3. Local health purview would be redundant.**

ACCESS AND QUALITY

9. Have you conducted special activities outside of the traditional environmental health program requirements in the school regulations that have been successful?

Yes	No
51.8%	48.2%

If so, please give a brief description of what you have accomplished.

Examples provided by over a dozen local health jurisdictions included the following :

- School playground injury prevention project in cooperation with Federal Centers for Disease Control and State Department of Health aimed at data collection of injuries and training of playground supervisory staff.**
- Participated in school career days activities and careers mentoring program**
- Provided training activities for school kitchen staff on proper food handling practices aimed at prevention of food-borne illness.**
- Participated in local school advisory boards and committees aimed at developing partnerships with various stakeholders.**
- Consulted with Parent Teacher organizations on specific issues such as playground equipment criteria to promote safe playgrounds.**

- Special investigations and coordination with other agencies ,the media and the community on environmental health issues associated with indoor air quality complaints, abnormal occurrences of various diseases of unknown origin, and water and on-site sewage problems.
- Performed a special school facility assessment to determine the importance of participation by environmental health staff in the overall school program.
- Provided routine mailings to all schools of various kinds of public health literature of interest to the community on current issues.
- Participated in health education classes for students with emphasis on the importance of personal hygiene and the depth and breadth of public health programs.
- Conducted a special health and safety survey of climber equipment for school program use aimed at preventing injury of students.

ASSESSMENT

10. Is the information that is collected during school inspections entered into a computerized data management system?

Yes	No	
14.3%	78.6%	7.1%(N.A.)

If yes, have the data been interpreted or results summarized?

*Yes	No
75%	25%

***This represents only the response from the Depts./Districts answering "yes" to the prior question. The interpreted data includes specialized data, not necessarily all of the data collected such as only playground safety data.**

Recommendations:

Although the information provided through the survey report is useful in describing the magnitude and distribution of local health activities in primary and secondary schools, input and evaluation from all interested parties is needed prior to recommendations to the Board of Health regarding WAC 246-366. The process for gathering such input and reporting back to the Board is described in "Resolution B" from the actions taken on June 8, 1994. The resolution states the following:

"Request that DOH convene a workgroup of all interested parties to review and recommend revisions to WAC 246-366 - Primary and Secondary Schools, with an interim report to the Board no later than December 1995 and a report to the Board on recommended revisions no later than December 1996."

Therefore, it is our recommendation that the process continue involving the establishment of a representative workgroup aimed at fulfilling the intent of the resolution. It is further recommended that the timeframe for a report to the Board be extended to July 1997 with periodic updates to the Board on the workgroup progress.

Additionally, other issues are also emerging that may have legislative implications including the concerns over the fees charged by some of the local health jurisdictions. Ideally, we would prefer that the longer range planning for the school program continue regardless of the possibility of political interventions that could occur outside of our control.



STATE OF WASHINGTON

WASHINGTON STATE BOARD OF HEALTH

1102 SE Quince Street • PO Box 47990

Olympia, Washington 98504-7990

DATE PRIORITY HEALTH GOAL: CONTROL AND REDUCE EXPOSURE TO HAZARDS IN THE ENVIRONMENT IN WHICH WE LIVE, WORK, AND PLAY

WASHINGTON STATE BOARD OF HEALTH ACTION ON SCHOOLS AND SCHOOL ENVIRONMENTS
WAC 246-366)

Motion Adopted June 8, 1994:

1. Request DOH, OSPI, local health departments/districts, and the University of Washington School of Public Health and Community Medicine jointly undertake a survey of implementation of Board rules related to public and private schools and school environments, and report to the Board no later than May 1996.
2. Request DOH convene a workgroup of all interested parties to review and recommend revisions to WAC 246-366 - Primary and Secondary Schools, with an interim report to the Board no later than December 1995, and a report to the Board on recommended revisions no later than December 1996.
3. Request DOH convene a workgroup of all interested parties to review school indoor quality standards and their relation to Board of Health requirements found in WAC 246-366-080 - Ventilation, with a report on best management practices related to school indoor air quality and whether WAC 246-366-080 needs revision, no later than May 1995.
4. Request DOH and OSPI review the potential benefits and costs of having the Board adopt as regulations the safety guidelines found in OSPI's *School Science Laboratories: A Guide to Some Hazardous Substances*, and in the U.S. Consumer Product Safety Commission's *Handbook for Public School Safety*, and report to the Board by December 1995.
5. Request DOH and OSPI "jointly prepare a guide for use by department (DOH) personnel during routine school inspections in identifying violations of good safety practices. The guide should also include recommendations for safe facilities and safety practices." (WAC 246-366-140) Request DOH and OSPI report to the Board on the draft of the guide no later than March 1996.
6. Request DOH report to the Board during 1995 with a progress report on its assessment of the pilot school playground injury reporting system, to determine whether the Board should recommend setting up and funding such a system statewide.



Local Health Department Questionnaire
Chapter 246-366 WAC - Primary and Secondary Schools
Implementation Survey for State Board of Health

May 10, 1996

Instructions

This questionnaire is designed to gather general information about the level of participation by local environmental health departments/districts in implementing State Board of Health rules relating to public and private schools.

The questionnaire should take no more than 20 minutes to complete and will not require you to review records or files.

When completed, please return your questionnaire to:

School Program Questionnaire
Office of Community Environmental Health Programs
P.O. Box 47826
Olympia, WA 98504

If you need more space for written comments, please attach additional pages with corresponding survey question numbers.

If you find questions that are unclear or don't fit your situation, feel free to make a notation on the questionnaire or give us a call for clarification. We appreciate your input and cooperation on this effort.

The staff contact for questions or comments is Terry Walker who can be reached by telephone at 360-586-0459 or by E-mail at: tlw0303@hub.doh.wa.gov

Survey Respondent:

Title:

Phone:

Agency:

Address:

Date:

Local Health Department Questionnaire
Chapter 246-366 WAC - Primary and Secondary Schools
Implementation Survey for State Board of Health
5/10/96

PREVENTION: Health Protection

1. Relative to all environmental health functions that are conducted by your office, what is the importance of conducting comprehensive inspections of primary and secondary schools under Chapter 246-366 WAC? *(Please circle your response)*

Low Moderately low Moderate Moderately high High

2. When schools are built (e.g., new schools) or altered (e.g., new additions) in your jurisdiction, how often does your office conduct **plan reviews and pre-occupancy inspections** as described by WAC 246-366-040? *(Please circle your response)*

Always Sometimes Never

3. On the average, how often does your office conduct **comprehensive inspections** of K-12 public and private schools to assure compliance with Chapter 246-366 WAC, Primary and Secondary Schools? *(Please circle your response)*

Public Schools:

More than once/year
Once/year
Less than once/year
Less than once/3 years
Less than once/5 years
Never

Private Schools:

More than once/year
Once/year
Less than once/year
Less than once/3 years
Less than once/5 years
Never

4. Does your office ever conduct **issue specific inspections** (e.g., just food handling inspections) of K-12 public and private schools within your jurisdiction to assure compliance with Chapter 246-366 WAC, Primary and Secondary Schools? *(Please circle your response)*

Yes No

If yes, would you please describe why and provide some examples (e.g., *responding to a complaint*)?

5. Does your office ever conduct **issue specific inspections** (e.g., just food handling inspections) of K-12 public and private schools within your jurisdiction to assure compliance with other regulations such as the food code? *(Please circle your response)*

Yes

No

If yes, would you please describe why and provide some examples (e.g., *conducting a routine food inspection, etc.*)?

PREVENTION: Health Protection (Capacity)

6. Approximately how much **staff time** (total FTE's) is allocated for school inspections? *(Please fill in your response)*

_____ FTE(s)

7. Do you have a **fee schedule** for comprehensive inspections of schools? *(Please circle your response)*

Yes

No

If yes, would you please itemize the fees or attach a fee schedule.

8. How important is each of the following barriers and limitations to implementing an inspection program under Chapter 246-366 WAC? (Please circle your responses)

Category

Ranking

	No Importance		Moderate Importance		Critical Importance
Lack of staff resources	1	2	3	4	5
Lack of revenue base (fees)	1	2	3	4	5
Lack of staff training	1	2	3	4	5
Lack of cooperation from school districts	1	2	3	4	5
Lack of public health priority for community	1	2	3	4	5
Lack of political support (local health board)	1	2	3	4	5
Other: _____	1	2	3	4	5

If "Other" please explain:

ACCESS AND QUALITY

9. Have you conducted **special activities** outside of the traditional environmental health program requirements in the school regulations that have been successful? (Please circle your response)

Yes

No

If so, please give a brief description of what you have accomplished.

ASSESSMENT

10. Is the information that is collected during school inspections entered into a computerized data management system? (Please circle your response)

Yes

No

If yes, have the data been interpreted or results summarized? (Please circle your response)

Yes

No

PUBLIC AND PRIVATE SCHOOL ENROLLMENT - OCTOBER 1995 - S.P.I.								
Local Health Dept.	Public Enrollment	Schools	Private Enrollment	Schools	TOTAL ENROLLMENT	TOTAL SCHOOLS		
Adams	3,685	11	93	4	3,778	15		
Asotin	3,713	10	159	1	3,872	11		
Benton-Franklin	36,938	65	1,900	11	38,838	76		
Bremerton-Kitsap	41,149	65	1,937	17	43,086	82		
Chelan-Douglas	18,751	48	825	8	19,576	56		
Clallam	10,631	22	332	3	10,963	25		
Columbia	843	3	34	1	877	4		
Cowlitz	17,473	39	1,025	5	18,498	44		
Garfield	454	2			454	2		
Grant	15,668	44	621	7	16,289	51		
Grays Harbor	14,021	38	202	2	14,223	40		
Island	9,857	21	540	5	10,397	26		
Jefferson	3,837	11	85	4	3,922	15		
Kittitas	4,778	14	100	2	4,878	16		
Lewis	13,309	38	435	4	13,744	42		
Lincoln	2,313	16	184	4	2,497	20		
Mason	8,549	18	198	4	8,747	22		
NE Tri-Counties	10,521	39	37	1	10,558	40		
Okanogan	8,162	26	128	6	8,290	32		
Pacific	3,789	18	7	2	3,796	20		
San Juan	1,825	11	33	1	1,858	12		
Seattle-King	239,404	446	33,907	165	273,311	611		
Skagit	17,382	41	854	6	18,236	47		
Snohomish	93,077	161	4,932	43	98,009	204		
SW Washington	62,963	117	2,525	16	65,488	133		

	Public		Private		TOTAL	
Local Health Dept.	Enrollment	Schools	Enrollment	Schools	ENROLLMENT	SCHOOLS
Spokane	72,301	144	6,383	35	78,684	179
Tacoma-Pierce	117,550	228	9,414	37	126,964	265
Thurston	37,159	69	1,565	15	38,724	84
Wahkiakum	576	2			576	2
Walla Walla	9,750	23	1,202	8	10,952	31
Whatcom	24,270	51	2,575	21	26,845	72
Whitman	5,035	24	211	4	5,246	28
Yakima	46,809	83	2,277	14	49,086	97
TOTALS	956,542	1,948	74,720	456	1,031,262	2,404